## Federal Defenders OF NEW YORK, INC.

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March 11, 2020

BY ECF

Honorable Andrew L. Carter, Jr United States District Judge Southern District of New York Thurgood Marshall Courthouse, 40 Foley Square, New York, New York 10007 USDC SDNY
DOCUMENT ELECTRONICALLY
FILED
DOC#:
DATE FILED: 3-11-21

Re: <u>United States v. Lawrence Bruce</u>

20 Cr. 167 (ALC)

Dear Judge Carter,

I respectfully write on behalf of my client, Lawrence Bruce, to request that Mr. Bruce's bail conditions be modified. Mr. Bruce is currently on home detention. We would like to modify this condition to a curfew, primarily so that Mr. Bruce can more frequently spend time with his daughter who lives in Queens. Pre-Trial has no onjection to the modification and the government defers to Pre-Trial.

On May 8<sup>th</sup>, 2020, Your Honor ordered the following bail conditions for Mr. Bruce: \$50,000 PRB; 1 FRP; Travel restricted to SDNY/EDNY; Surrender all Travel Documents and make no new applications; Pretrial Supervision as directed by PTS; Electronic Monitoring; Def. not to possess firearm/destructive device/other weapon. Mr. Bruce's monitoring was modified from home incarceration to home detention on October 16, 2020.

Since his release, Mr. Bruce has complied with all the conditions of his

release application is  $\sqrt{granted}$ .

. .

Respectfully submitted,

'/s/

Andrew L. Carter Jr, U.S.D.J.

Jennifer E. Willis

Dated: March 11, 2021

Assistant Federal Defender

212-417-8743

cc:

NY, New York All counsel on record (ECF) Mohammed Ahmed (PTSO)